

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF TEXAS
3 HOUSTON DIVISION

5 SECURITIES AND EXCHANGE)
6 COMMISSION,)
7)
8 Plaintiff,)
9)
10 vs.) Case No. 4:22-cv-3359
11)
12 MAURICIO CHAVEZ,)
13 GIORGIO BENVENUTO, and)
14 CRYPTOFX, LLC,)
15)
16 Defendants.)
17)
18 and)
19)
20 CBT GROUP, LLC,)
21)
22 Relief Defendant.)
23)
24)

15 ORAL AND VIDEOTAPED DEPOSITION OF
16 MARIA SARAVIA
17 DECEMBER 15, 2022

19 ORAL AND VIDEOTAPED DEPOSITION OF MARIA SARAVIA,
20 produced as a witness at the instance of the PLAINTIFF,
21 and duly sworn, was taken in the above-styled and
22 numbered cause on DECEMBER 15, 2022, from 9:17 a.m. to
23 6:19 p.m., before Donna L. Garza, CSR, in and for the
24 State of Texas, reported by machine shorthand, at the
law offices of Shook, Hardy & Bacon, LLP, 600 Travis
Street, Suite 3400, Houston, Texas, pursuant to the
Federal Rules of Civil Procedure and the provisions
stated on the record or attached hereto; that the
deposition shall be read and signed before any notary
public.

25 JOB No. 221215WWC

1 Q. Where is Ascira headquartered?
2 A. In Dubai.
3 Q. Did you ever get to travel to Dubai?
4 A. But I've won a trip to go there in February
10:23 5 for my husband and me.
6 Q. How did you win a trip to Dubai through
7 Ascira?
8 A. You have to invite nine people, and I did.
9 Q. Does everyone who invites nine people get to
10:23 10 go to Dubai?
11 A. They go to Dubai. If you want to come with
12 me...
13 Q. How do I get in touch with these people? I'm
14 serious. How do I get in touch with these people?
10:24 15 A. Well, you have my telephone.
16 Q. Do you know who I -- so, their contact
17 information is listed under Ascira on your telephone
18 number?
19 A. That's through the Internet. But I have
10:24 20 photographs there of what I won, if you want to see
21 them.
22 Q. Who -- who here got you into Ascira?
23 A. The husband of my sister invited me. He also
24 won the trip.
10:24 25 Q. Are you going at the same time?

1 bonus or commission payment from CFX?

2 A. Yes. After that, I wasn't paid.

3 Q. Do you --

4 A. That's why I'm mad.

14:45 5 Q. Do you believe that you received \$10,000 in
6 bitcoin?

7 A. He was going to send it to me in bitcoin, but
8 I didn't want it. He gave it to me in cash. I didn't
9 want him to send that.

14:46 10 Q. And when you say "He was going to send it,"
11 who are you talking about?

12 A. Mauricio.

13 Q. Okay. Did you have a personal conversation
14 with Mauricio about whether this would be in bitcoin or
14:46 15 in cash?

16 A. Yes.

17 Q. What does \$80,000 in "contratos" mean here?

18 A. I don't know -- I don't know what it is
19 referring to, but it was bonuses that I was paid. And
14:47 20 bonuses and contracts, perhaps that's why they put it in
21 there.

22 Q. So, are -- are you saying to us today that

23 this \$90,000 includes both bonus and commission payments
24 to you and contract payments?

14:47 25 A. Yes.

1 Q. Okay. Is -- would this be broken out anywhere
2 so we could know what belonged to what?

3 A. No.

4 Q. Did you believe that this \$90,000 had been
14:47 5 correctly calculated?

6 A. I don't remember, because I don't even
7 remember this date.

8 Q. Do you remember getting paid \$90,000?

9 A. Yes.

10 Q. And did you think that's what you were owed?

11 A. I believe so. I don't -- I don't remember, to
12 tell you the truth.

13 Q. Do you think you would recall -- do you think
14 you would have known if Mauricio was shortchanging you?

14:48 15 A. I don't remember. I'm not able to tell you
16 "yes" or "no."

17 Q. After this date in February, did you earn more
18 bonuses that haven't been paid?

19 A. Bonuses I have not been paid. I don't
14:49 20 remember. I don't remember contracts. Bonuses, I have
21 not been paid.

22 (Marked Saravia Exhibit 47.)

23 Q. (BY MR. GULDE) Okay. I'm going to hand you
24 what I put exhibit sticker No. 47 on. And it's a
14:50 25 collection of documents, some of which have been

1 A. Yes.

2 Q. Were you just scheduled not to come in that
3 day?

4 A. I would go Tuesday and Wednesdays.

15:29 5 Q. Okay. Who kept that schedule, by the way?

6 How did -- how did CFX know who was going to show up?

7 A. I would go Tuesdays and Wednesdays. Because
8 on Wednesdays, I would stay for the classes. That's why
9 I scheduled it what way.

15:29 10 Q. My question to you is: Was there someone at
11 CFX who organized various shifts that people worked?

12 A. That was if I wanted to go, I would go. If
13 not, not.

14 Q. Were there ever days when nobody showed up to
15:30 15 work?

16 A. Yes. Nobody showed up to make contracts, or
17 do you mean to work?

18 Q. Either one. Let's talk about contracts.

19 So, were there days when people didn't
15:30 20 show up to -- to become -- to create a contract for
21 themselves?

22 A. Yes. There were days that nobody would show
23 up.

24 Q. Were there days when CFX was just
15:30 25 understaffed?

1 A. Yes, inside a cabinet.

2 Q. Was it like a white or a black cabinet? Do
3 you recall the color?

4 A. The cabinet was white, but the safe was black.

17:23 5 Q. And that's the only safe that you saw at the
6 Blalock office?

7 A. Yes. That's the only one, the only I saw.

8 Q. Who had the codes to that safe or the keys?

9 A. I.

17:24 10 Q. Did anybody else have the keys or the codes to
11 the safe?

12 A. No. Only I so they wouldn't steal.

13 Q. And who gave you the codes to the safe?

14 A. Where it was bought, the code was with it.

17:24 15 Q. How come Norma, the accountant, didn't have
16 the codes to that safe?

17 A. Because that's where I kept my money. If all
18 of a sudden it was stolen, they wouldn't know if it was
19 her or if it was me.

17:25 20 Q. And, so, you -- in all of CFX employees and
21 representatives, you were the only person who had the
22 codes to that safe?

23 A. Yes.

24 Q. Okay. And who knew that you were the only
17:25 25 person who had the codes to that safe?

1 A. Norma. I told her because she was the
2 manager.

3 Q. And did Mauricio also know that you were the
4 one who had the codes to that safe?

17:26 5 A. I don't remember if I told -- I told him, too.
6 But I informed her so that she would know.

7 Q. Now, if Mauricio wanted to have access to that
8 safe, what would he have to do?

9 A. He would have asked. He would have had to ask
17:26 10 me for the number.

11 Q. Would you have given it to him?

12 A. If I would be present, yes. If not, no.

13 Q. And why is that?

14 A. For my safety. If it was lost, then they
17:27 15 would want -- if it was lost, they -- then they would
16 want me to pay it back.

17 Q. Okay. And the other leaders at CFX, did they
18 have their own safes?

19 A. No.

17:27 20 Q. Okay. So, why were you so special to have
21 your own safe?

22 A. Because I asked for it for safety. Because if
23 they -- if they asked me to work and if there was nobody
24 upstairs, then who is going to manage that money?

17:27 25 Q. What do you mean "if there was nobody

1 A. No. I didn't know you.

2 Q. Okay. Let me first say congratulations on
3 paying off your house.

4 Now, you mentioned several companies that

18:12 5 you were involved with. I believe it was Melaleuca,
6 Zurvita, Ambit, Organo Gold?

7 A. No. Organo Gold, no.

8 Q. You were not involved.

9 But you were with the other three?

18:13 10 A. Correct.

11 Q. And I think you mentioned with Melaleuca, you
12 went to a sales meeting?

13 A. Yes.

14 Q. People speaking very positively about the
18:13 15 company and its products?

16 A. Correct.

17 Q. And then with Ascira, that's the one you're
18 doing currently and you're expecting to take a trip to
19 Dubai in February; is that correct?

18:13 20 A. Yes, sir.

21 Q. And with each of those, you receive some
22 compensation if you bring other people to the company,
23 correct?

24 A. Yes, sir.

18:13 25 Q. Okay. And I think during a break, I heard you

1 say you also sold Amway long ago, correct?

2 A. Yes, in the '90s.

3 Q. And did you receive compensation if you
4 brought other people to Amway?

18:14 5 A. Everywhere they have paid me.

6 Q. And Amway is still operating today, correct?

7 A. No, not anymore.

8 Q. You're not doing Amway anymore, or the company
9 is no longer operating?

18:14 10 A. No. Amway still functions, but I don't work
11 with it anymore. Amway has been around for 50 years.

12 Q. Right. And those other companies we
13 mentioned -- Melaleuca, Zurvita, Ambit, and Ascira --
14 all those are still operating, correct?

18:14 15 A. Yes, sir.

16 Q. Okay. Now, I want to make sure I heard this
17 right. When you first heard about CryptoFX, it was
18 explained to you that you might get 15 percent, that you
19 might not get anything, correct?

18:15 20 A. From zero to 15.

21 Q. And did you explain to the people that you
22 told about CFX that they had the same situation; they
23 could get 15 percent or they might get zero?

24 A. Yes, sir.

18:15 25 Q. And you took a lot of classes at CFX, correct?

1 A. Yes, sir.

2 Q. You learned to open bitcoin wallets?

3 A. Yes, to buy and sell coins.

4 Q. And you started with CFX, you believe, in June
18:16 5 of 2020?

6 A. Yes.

7 Q. But I think we saw some documents that said it
8 might have been as late as December 2020, you thought?

9 A. The contract was with that date. I don't know
18:16 10 why. I started before.

11 Q. But in any case, you had no knowledge of CFX
12 prior to June of 2020, correct?

13 A. No.

14 Q. And did you ever meet or communicate with
18:17 15 Gustavo Gomez?

16 A. I saw him two or three times at the office.

17 Q. And what did you understand him -- his role to
18 be at CFX?

19 A. I -- I know that he was part of CFX. I never
18:17 20 knew if he was owner or whatever.

21 Q. Okay. Do you have any knowledge of whether
22 Mauricio Chavez was successful in trading bitcoin?

23 A. Yes, sir.

24 Q. And what did you know about that?

18:18 25 A. That he earned a lot of money with the

1 purchase and selling of coins.

2 Q. And up to mid-September of 2022, had CFX, to
3 your knowledge, made all the payments it was supposed to
4 make on all the contracts that students had?

18:18 5 A. Yes. They always paid because I always paid.

6 MR. FLACK: Okay. Thank you. I don't
7 have any further questions.

8 MR. GULDE: We can close?

9 MR. FLACK: You can take off your
18:19 10 microphone.

11 THE VIDEOGRAPHER: Off the record at
12 6:19 p.m.

13 THE COURT REPORTER: Are you getting a
14 copy?

18:19 15 MR. FLACK: Yes.

16 MS. AGUILAR: Yes, please.

17 MS. THEMELI: Yes.

18 (The deposition concluded at 6:19 p.m.)

19

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25

1 THE STATE OF TEXAS)

2 COUNTY OF POLK)

3

4 I, Donna L. Garza, Certified Shorthand
5 Reporter in and for the State of Texas, do hereby
6 certify that the above and foregoing contains a true and
7 correct transcription of all portions of evidence and
8 other proceedings in the above-styled and numbered
9 cause, all of which occurred and were reported by me.

10 I further certify that I am neither counsel
11 for, related to, nor employed by any of the parties or
12 attorneys in the action in which this proceeding was
13 taken, and further that I am not financially or
14 otherwise interested in the outcome of the action.

15 GIVEN UNDER MY HAND AND SEAL OF OFFICE, on
16 this, the 20th day of December, 2022.

17

18

Donna Garza



19

DONNA L. GARZA, TEXAS CSR NO. 4785

20

Expiration Date: 12-31-22

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